

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

STATE CORPORATION COMMISSION

MAR 03 2000

In the Matter of GCC License Corporation)
Petition for Designation as an Eligible)
Telecommunications Carrier)

Docket No. 99-GCCZ-156-ETC

Docket
Room

Application of Sprint Spectrum L.P. (d/b/a)
Sprint PCS) for Designation as an Eligible)
Telecommunications Carriers for Purposes)
of Receiving Federal and State Univeral)
Service Support)

Docket No. 99-SSLC-173-ETC

DIRECT TESTIMONY OF
JAMES BLUNDELL
ON BEHALF OF
GCC LICENSE LLC

Witness Qualification and Introduction

Q. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT, AND BUSINESS ADDRESS.

A. My name is James Blundell. I am employed by Western Wireless Corporation and my business address is as follows:

James Blundell, Esq.
Director of External Affairs
Western Wireless Corporation
3650 131st Ave., SE - Suite 400
Bellevue, Washington 98006
(425) 586-8736 (tel)
(425) 586-8090 (fax)

1 **Q. WHAT ARE YOUR RESPONSIBILITIES WITHIN WESTERN WIRELESS**
2 **CORPORATION?**

3
4 A. As Director of External Affairs, my primary responsibility is to represent the Company
5 and its subsidiaries in all government and industry affairs. I am responsible for many
6 state and federal regulatory and legislative matters for Western Wireless Corporation and
7 its subsidiaries, including GCC License LLC d/b/a Cellular One in eastern Kansas
8 (collectively "Western").¹ I have lead responsibility for the filing and management of
9 Western's applications for designation as an eligible telecommunications carrier ("ETC")
10 before numerous state commissions. In that capacity, I have gained substantial
11 knowledge about the products and services offered by Western, as well as its network and
12 business operations. I have also gained substantial knowledge about the service Western
13 will offer once designated as an ETC, including its features and service areas.
14 I am also responsible for the management of regulatory proceedings in several states
15 involving the reform of state universal service rules, as well as other issues such as
16 slamming/cramming, E9 11, numbering, etc. Finally, I have lead responsibility for all
17 legislative affairs of the Company, both at the state and federal levels, and all industry
18 affairs as well.

19 **Q. PLEASE DESCRIBE YOUR WORK EXPERIENCE.**

20 A. Since January, 1999, I have worked for Western Wireless Corporation as the Director of
21 External Affairs. Prior to joining Western Wireless, I served as House Counsel to the
22 Washington State House of Representatives. Before working for the Washington State

¹Since the filing of the initial Verified Petition, GCC License Corporation was restructured for tax reasons from a corporation to a limited liability company. It is now named GCC License LLC.

1 House of Representatives, I was an associate at the law firm of Owens Davies Mackie in
2 Olympia, Washington, where I practiced in the areas of land use and municipal law.

3 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

4 A. I hold a Juris Doctorate degree from Santa Clara University in Santa Clara, California
5 and a Bachelor of Arts degree in Political Science from the University of Washington in
6 Seattle, Washington.

7 **Q. WHAT ARE THE PURPOSES OF YOUR TESTIMONY?**

8 A. The purposes of my testimony are two-fold: first, I will identify Western's requested
9 designated service areas for the rural telephone company study areas in Kansas and I will
10 describe Western's plans for providing universal service offerings in these areas in
11 compliance with the ETC obligations; second, I will explain the public interest benefits
12 that will be realized by designating Western as an additional ETC in the areas served by
13 rural telephone companies.

14 **Q. DOES WESTERN CURRENTLY PROVIDE TELECOMMUNICATIONS**
15 **SERVICES IN KANSAS?**

16
17 A. Yes. Western is a "telecommunications carrier" as defined in 47 U.S.C. § 153(49).
18 Western is authorized by the Federal Communications Commission ("FCC") and is a
19 facilities-based provider of commercial mobile radio services ("CMRS") under the brand
20 name "Cellular One" in the following counties in Kansas: Allen, Anderson, Bourbon,
21 Chase, Clay, Cloud, Coffey, Cowley, Dickinson, Ellsworth, Franklin, Geary, Greenwood,
22 Harper, Harvey, Jewell, Kingman, Lincoln, Linn, Lyon, Marion, Marshall, McPherson,
23 Miami, Mitchell, Morris, Nemaha, Ottawa, Pottawatomie, Reno, Republic, Rice, Riley,
24 Saline, Sumner, Wabaunsee, Washington and Woodson. The CMRS services provided in

1 Kansas include mobile telephony, data/facsimile, 911, voice mail, and several other
2 features and services.

3 **Q. TURNING TO THE MATTER OF UNIVERSAL SERVICE, DOES WESTERN**
4 **OR ITS SUBSIDIARIES CURRENTLY CONTRIBUTE TO UNIVERSAL**
5 **SERVICE FUNDS?**
6

7 A. Yes. At the present time, federal regulations require a carrier like Western to contribute
8 approximately 5.877 percent of its interstate revenues to the funding of federal universal
9 service, and many states also require Western to contribute to the funding of state
10 universal service. In the state of Kansas, Western contributes to the funding of the
11 Kansas Universal Service Fund ("KUSF") in accordance with the decisions of the Kansas
12 Corporation Commission ("Commission").

13 **Q. IS THE COMPANY PRESENTLY ABLE TO DRAW FROM FEDERAL**
14 **UNIVERSAL SERVICE FUNDS OR THE KUSF FOR THE PROVISION OF THE**
15 **SUPPORTED SERVICES IN AREAS SERVED BY A RURAL TELEPHONE**
16 **COMPANY?**
17

18 A. Not in Kansas. Until Western is designated as an ETC, it is not able to draw from federal
19 universal service funds or the KUSF for its provisioning of universal service in areas
20 served by rural LECS. Upon designation as an ETC, Western will be eligible to receive
21 universal service funds, which will allow the Company to make available to the
22 consumers otherwise served by a rural telephone company a universal service offering
23 that meets their telecommunications needs. A competitive carrier, like Western, is at a
24 severe competitive disadvantage and is limited in its ability to provide a competitive
25 universal service offering to consumers in rural high-cost areas if it does not have access
26 to the universal service subsidies and is expected to compete with an incumbent LEC
27 who receives the subsidies. Unlike urban areas where carriers are able to compete based
28 upon the cost of providing service, rural high-cost areas will not experience the full

benefits of competition unless competitive carriers are designated as ETCs for purposes of universal service support.

Q. WHEN DID WESTERN FILE AN APPLICATION FOR DESIGNATION AS AN ETC IN THE STATE OF KANSAS?

A. Western's Verified Petition for designation as an ETC was filed with the Commission on September 2, 1998.

Q. WHAT HAS THE COMMISSION DETERMINED IN THIS PROCEEDING CONCERNING WESTERN'S REQUEST FOR DESIGNATION AS AN ETC?

A. On January 18, 2000, the Commission issued Order #6 granting Western ETC status in certain wire centers for Southwestern Bell Telephone Company ("SWBT") for purposes of federal universal service support. On February 29, 2000, the Commission issued Order #7 On Reconsideration granting Western ETC status for state universal services in the territories of SWBT and Sprint Telephone Company - Kansas ("Sprint") for purposes of the KUSF. Under Order #6 and Order #7, the Commission concluded that Western satisfies the basic criteria under 47 U.S.C. § 214(e) for ETC designation, but that an evidentiary hearing should be held on the "public interest" determination under 47 U.S.C. § 214(e)(2) to designate Western as an additional ETC in rural telephone company areas. Specifically, the Commission rejected various arguments advocated by SWBT and other intervenors and affirmatively found and concluded that (a) Western offers each of the services supported by federal universal service support mechanisms in 47 C.F.R. § 54.101(a); and (b) Western advertises the availability of such services and charges using media of general distribution, in satisfaction of the requirements of Section 214(e)(1). (Order #6, p. 12; Order #7, pp. 3-4). The Commission further found that Western offers the services throughout the non-rural wire centers identified in Order #6, as corrected by Exhibit A to Order #7, in compliance with Section 214(e)(2) and (5).

1 (Order #6, p. 13; Order #7, p. 7). The Commission noted that prior to granting ETC
2 designation in a wire center served by a rural telephone company, the Commission must
3 first determine that designating an additional ETC is in the public interest. (Order #6, p.
4 15). Consequently, the Commission established a procedural schedule to determine
5 whether it is in the public interest to designate Western as an additional ETC in Kansas
6 wire centers served by rural telephone companies.

7 **Q. HAS THE COMMISSION MADE ANY OTHER DETERMINATIONS**
8 **REGARDING THE "PUBLIC INTEREST" FACTOR UNDER SECTION**
9 **214(e)(2)?**

10
11 A. Yes. In Order #5 dated March 18, 1999, the Commission discussed the necessity to
12 ascertain whether it is in the public interest to designate additional telecommunications
13 carriers in the rural telephone company study areas. (Order #5, p. 12). The Commission
14 indicated that it "anticipates that it will evaluate each study area individually." (*Id.*)
15 Moreover, Order #7 states the Commission will "articulate the factors it will consider in
16 determining the public interest for ETC designation in rural telephone company wire
17 centers, however, those factors will be listed and discussed in a separate order," (Order
18 #7, p. 7). Since the Commission has not yet issued such an Order as of the date of this
19 direct testimony, Western will address any factors identified by the Commission at the
20 time of its rebuttal testimony.

21 ***Requested Designated Service Areas For Rural LECs***

22 **Q. ARE YOU FAMILIAR WITH THE AREAS SERVED BY WESTERN IN KANSAS**
23 **IN WHICH THE COMPANY IS SEEKING DESIGNATION AS AN ETC?**

24
25 A. In its original Verified Petition, Western identified the Kansas counties in which the
26 Company is authorized to serve and stated that it is seeking designation in all local
27 exchanges within these counties. On March 18, 1999, the Commission issued Order #5

1 in this proceeding by which the Commission identified the rural telephone company
2 study areas in which Western appeared to provide service throughout the entire study
3 area. (Order #5, Exhibit A). Western undertook to review the identified study areas
4 based on publically available information and attempted to identify more precisely the
5 rural telephone company study areas in which it is seeking designation as an additional
6 ETC. Western filed with the Commission the Affidavit of Gene DeJordy In Support of
7 GCC License Corporation Petition For Designation As An Eligible Telecommunications
8 Carrier dated April 8, 1999 ("DeJordy Affidavit"). I have reviewed the DeJordy
9 Affidavit and I am personally familiar with the factual statements contained in the
10 document. I adopt the DeJordy Affidavit by reference as part of my direct testimony.

11 Q. **HOW IS A SERVICE AREA DETERMINED UNDER SECTION 214(e) FOR**
12 **PURPOSES OF ETC DESIGNATION?**

13
14 A. Section 214(c)(5) of the Act defines the term "service area" as a geographic area
15 established by a state commission for the purpose of determining universal service
16 obligations and support mechanisms. For an area served by a rural telephone company,
17 Section 214(c)(5) and FCC Rule 54.207(b) provide that the term "service area" means the
18 rural telephone company's "study area," unless and until the FCC and the state establish a
19 different definition for such a company under the FCC's procedures prescribed in Rule
20 54.207(c) and (d). A "study area" is generally considered to be the rural incumbent
21 LEC's existing certificated exchange service areas in a given state. In the Matter of
22 Federal-State Joint Board on Universal Service, CC Docket 96-45, Report and Order,
23 FCC 97-157 (May 8, 1997) ("*Universal Service Order*"), ¶ 172, fn. 434. The FCC did
24 recommend that states define rural service areas to consist only of "the contiguous
25 portions of a rural study area, rather than the entire rural study area" to best serve the

1 universal service policy objectives of the Act. *Universal Service Order*, ¶ 190. The FCC
2 recognized that the failure to do so would likely impose unnecessary barriers to entry,
3 especially for wireless providers, that would do a disservice to rural customers. *Id.*

4 **Q. IN WHAT AREAS SERVED BY A RURAL TELEPHONE COMPANY IS**
5 **WESTERN SEEKING DESIGNATION AS AN ADDITIONAL ETC?**
6

7 A. As set forth in paragraph 6 of the DeJordy Affidavit, Western offers all of the services
8 and functionalities set forth in FCC Rule 54.101 throughout the entire Kansas study areas
9 of the following rural telephone companies: Blue Valley Telephone Co., Inc., Bluestern
10 Telephone Company, Council Grove Telephone Co., Great Plains Communications, Inc.,
11 H&B Communications, Inc., Home Telephone Company, Inc., La Harpe Telephone
12 Company, Inc., Madison Telephone Co., Inc., Mo-Kan Dial, Inc., Moundridge Telephone
13 Company, Mutual Telephone Co., Peoples Mutual Telephone Co., Tri-County Telephone
14 Association, Inc., Twin Valley Telephone, Inc., Wamego Telephone Co., Inc., Wilson
15 Telephone Company, Inc. and Zenda Telephone Company, Inc. Upon receiving ETC
16 designation and prior to offering universal service, Western will also advertise the
17 availability of the universal services and charges throughout these study areas using
18 media of general distribution. Set forth on Exhibit A to this testimony is a listing the
19 rural study areas in which Western is seeking ETC designation.

20 **Q. DID WESTERN ALSO SEEK ETC DESIGNATION FOR AREAS SERVED BY**
21 **SPRINT?**
22

23 A. Yes. Western's Verified Petition included a request for federal and state ETC designation
24 for a number of exchanges or wire centers served by Sprint. Under Order #7, the
25 Commission granted Western's request and designated Western as an ETC in the Sprint
26 service territories for state universal service support purposes. Under state law and for
27 KUSF purposes, Sprint is a non-rural telephone company. However, the Commission did

1 not grant Western's request for ETC designation in the Sprint service areas for federal
2 universal service support purposes. The Commission determined Sprint is considered a
3 "rural telephone company" under 47 U.S.C. § 153 (37), and it must make a public interest
4 finding under federal law before designating Western as an additional ETC in Sprint's
5 territory. (Order #7, p. 6). I am not in a position at this time to critically review this
6 determination, but if this determination stands it could have significant implications, as
7 explained below.

8 **Q. IF SPRINT IS A "RURAL TELEPHONE COMPANY" FOR FEDERAL**
9 **UNIVERSAL PURPOSES, CAN WESTERN PROPERLY BE DESIGNATED AS A**
10 **FEDERAL ETC IN THE SPRINT AREAS?**

11
12 **A.** As I previously testified, a competitive ETC is obligated to provide universal services
13 throughout the "study area" of a rural telephone company for purposes of federal
14 universal service support, unless the FCC and the state commission jointly act to establish
15 a different service area under the FCC's procedures in Rule 54.207(c) and (d). Based on
16 my review of publically available information, Western does not appear to provide
17 service throughout the entire Sprint study areas in Kansas.

18 **Q. WHAT DOES WESTERN RECOMMEND TO THE COMMISSION**
19 **CONCERNING THE INCLUSION OF THE SPRINT EXCHANGES WITHIN ITS**
20 **DESIGNATED SERVICE AREAS FOR FEDERAL ETC PURPOSES?**

21
22 **A.** As set forth in paragraph 7 and Exhibit C to the DeJordy Affidavit, Western offers all of
23 the services and functionalities set forth in FCC Rule 54.101 throughout 86 different
24 Sprint exchanges in Kansas. Western included these exchanges based on its
25 understanding that Sprint was a non-rural telephone company and Western would not be
26 required to serve Sprint's Kansas study area under FCC Rule 54.207(b). In fact, the
27 Commission did designate Western an ETC for KUSF purposes in these Sprint
28 exchanges. However, since the Commission has determined Sprint meets the criteria

1 used to define a "rural telephone company" under 47 U.S.C. § 153(47), it puts in question
2 whether the 86 Sprint exchanges identified on Exhibit C to the DeJordy Affidavit should
3 be excluded from Western's federal designated service areas. Western would be unable
4 to serve all of the Sprint exchanges within its study areas on a facilities basis since some
5 of the exchanges appear to be outside the scope of Western's authorized cellular licensed
6 area. Similarly, Western does not presently have a resale agreement with Sprint to enable
7 Western to serve any of the other exchanges on a total services resale basis.
8 Consequently, if it is required to serve the entire study area of Sprint, Western strongly
9 encourages the Commission to consider initiating a separate proceeding in accordance
10 with FCC Rule 54.207(c) to disaggregate the Sprint study area to include those 86
11 exchanges within Western's authorized cellular license and signal coverage area for
12 purposes of federal ETC designation.

13 *Provisioning Of Supported Services*

14 Q. **HOW WILL WESTERN PROVIDE THE SUPPORTED SERVICES WITHIN**
15 **THE RURAL STUDY AREAS IN WHICH IT SEEKS ETC STATUS?**

16
17 A. Western will provide the supported services using its existing network infrastructure and
18 CMRS spectrum. This includes the same antennae, cell sites, towers, trunking, mobile
19 switching center and interconnection facilities as used by the Company's conventional
20 mobile cellular service customers.

21 Initially, Western plans to deploy a wireless local loop access unit to provide universal
22 services to customers. A wireless local loop simply involves the placement of a wireless
23 access unit at a customer's location to transmit the signal to the nearest cell site. The
24 wireless access unit serves as the interface to Western's network, transmitting the signal
25 over the CMRS spectrum in the same manner as a handheld cellular phone unit. The,

1 technology functions as a replacement for the "last mile" of copper wire of the incumbent
2 LEC. However, the signal coverage for a customer using a wireless access unit is
3 optimized as compared to a typical handheld or portable phone being used as the radio
4 transmitter and receiver. Western plans to initially use the wireless access unit because
5 universal service customers may prefer a product that delivers "dial tone" and allows for
6 the connection of existing telephone and peripheral devices. The provisioning of a
7 universal service offering using a wireless access unit does not require any changes to
8 Western's network. Using a wireless access unit simply involves a different piece of
9 customer premises equipment at a customer's location. When a prospective customer
10 requests universal service using a wireless local loop, a Western customer service
11 technician will meet with the customer at the customer's residence. The customer service
12 technician will bring a wireless access unit, place that unit in the home and test the signal.
13 Because the wireless access unit has 3 watts of power, as opposed to .5 watts for a typical
14 mobile cellular handset, Western is able to ensure high quality service to customers. A
15 high-gain antenna can also be installed at a customer's location if necessary to receive a
16 high quality service. Thus, by the end of the initial service call, a customer anywhere in
17 Western's requested designated service areas should have access to a high quality service.
18 In the unlikely event that the efforts of the technician do not result in a high quality
19 service to the customer, Western will pursue other avenues to the extent necessary to
20 maximize signal coverage and serve all consumers within its designated service areas,
21 including increasing the power of the closest cell site or deploying additional cell sites
22 and channels, as needed.

23 Using this same technology, Western currently provides a type of "universal service" to
24 residents of Reese River and Antelope Valley, Nevada and Regent, North Dakota.

1 **Q. CAN YOU EXPLAIN WESTERN'S UNIVERSAL SERVICE OFFERING?**

2 A. Yes. Western will make available to consumers within its designated service areas the
3 supported services tailored to meet the consumers' communications needs. All universal
4 service offerings will include all of the FCC's required services under FCC Rule
5 54.101(a) and the services listed in K.S.A. 66-1,187 (p). ² One such offering may look
6 similar to services provided today by the LECs with certain optional features. For a fixed
7 monthly charge, Western intends to offer consumers the core supported services with
8 unlimited local usage, an expanded local calling area larger than that offered by the
9 incumbent LEC, a per minute charge for long distance calls, and optional features and
10 services, such as voice mail, caller-ID, call waiting, call forwarding, and conference
11 calling. Another offering could be a usage-sensitive plan under which a universal service
12 customer would receive the core supported services with a set amount of minutes of
13 usage for state-wide local calling, a per minute charge for interstate calls, and optional
14 features and services.

15 *Public Interest*

16 **Q. BEFORE DESIGNATING WESTERN AS AN ETC, IS THE COMMISSION**
17 **REQUIRED TO FIND THAT THE DESIGNATION IS IN THE PUBLIC**
18 **INTEREST?**

19 A. In territories served by non-rural telephone companies, a public interest finding is not
20 required and is not a prerequisite for designation as an ETC. As the Commission
21 previously recognized, a public interest finding is only required under 47 U.S.C. §
22

²Based on the Commission's determination in Order #7, Western is not required to provide equal access to interexchange carriers under K.S.A. 66-1, 187 (p). The Commission found the equal access requirement is preempted by 47 C.F.R. § 54.101 (a)(7) and 47 U.S.C. § 332(c)(8).

1 214(e)(2) for designation of more than one common carrier as an ETC in areas served by
2 rural telephone companies.

3 **Q. SECTION 214(e)(2) STATES THAT THE COMMISSION IS REQUIRED TO**
4 **FIND THAT DESIGNATING WESTERN AS AN ETC IN AREAS SERVED BY**
5 **RURAL, TELEPHONE COMPANIES IS IN THE PUBLIC INTEREST. IS**
6 **DESIGNATING WESTERN AS AN ADDITIONAL ETC IN THE PUBLIC**
7 **INTEREST?**

8
9 A. Yes. Consumers in rural areas will be significantly benefitted by the competition brought
10 about by designating Western as an additional ETC. Competition is in the public interest.
11 One of the underlying purposes of the Telecommunications Act of 1996 is to "promote
12 competition and reduce regulation in order to secure lower prices and higher quality
13 services for American telecommunications consumers and encourage the rapid
14 deployment of new telecommunications technologies." 100 Stat. 56 (1996). The public
15 interest standard under Section 214(c)(2) for designating ETCs in territories served by
16 rural telephone companies emphasizes competition and consumer benefit, not incumbent
17 protection. As explained by U.S. Senator Dorgan, who offered the amendment to the
18 Senate bill inserting the public interest requirement in Section 214(c)(2), "the best
19 interests of rural consumers are paramount." 141 Cong. Rec. S7951-52 (June 8, 1995).
20 The failure to designate Western as an ETC would deprive consumers of the benefits of
21 competition, including increased choices, higher quality service, and lower rates. As
22 discussed in the direct testimony of Western's witness Joseph Gillan, in a competitive
23 market, the rural consumer would be able to choose services from a carrier that best
24 meets the consumer's communications needs. Absent a choice of service providers, the
25 consumer is unable to make a selection based upon service quality, service availability or
26 rates. The incumbent provider has little or no incentive to introduce new, innovative, or

1 advanced service offerings. Competition promises to bring new and exciting services to
2 the rural consumer.

3 Western will offer universal services to rural consumers, as well as services not currently
4 provided by the landline LEC. For example, Western will provide an expanded local
5 calling area, which will benefit rural consumers who currently pay toll charges to reach
6 government offices, health care providers, businesses and family located outside of a
7 restricted landline local calling area. A universal service offering which includes
8 mobility will also have great appeal and benefits to rural consumers.

9 In addition to increased choices, Kansas' rural consumers may also experience lower
10 rates. At this time, Western has not finalized its pricing for the universal service
11 offerings, but the rates will be comparable to, if not less than, the local service rates
12 charged by the incumbent LEC. Otherwise, Western will not likely attract any
13 customers. Likewise, Western's service quality will need to meet or exceed the quality of
14 services provided by the incumbent LEC for Western to obtain customers. Designating
15 Western as an ETC will also further the deployment of new wireless technology available
16 to benefit Kansas' rural consumers, namely, a wireless local loop.

17 Western stands ready, willing and able to bring the benefits of competition to consumers
18 in Kansas – benefits of competitive pricing, better service quality, immediate service
19 availability, and better customer service. The increased choices for rural consumers will
20 advance universal service. There can be no dispute that giving consumers a choice in
21 services and service providers is in the public interest.

22 *Summary*

23 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

1 A. Western is a facilities-based provider of CMRS services in Kansas seeking ETC
2 designation in certain rural telephone company study areas for purposes of federal and
3 state universal service support. The Commission has already determined in Order #6 and
4 Order #7, that Western satisfies the basic criteria for federal and state ETC designation
5 and the Commission has designated Western as an ETC for certain non-rural telephone
6 company wire centers. Western should be designated as an ETC for both federal and
7 state universal service support in rural telephone company areas thereby allowing rural
8 consumers to realize the benefits of a competitive universal service offering. Western
9 offers all of the same services and functionalities and Western will advertise the
10 availability of the universal services and charges throughout the study areas of the rural
11 telephone companies which are identified in my testimony. The designation of Western
12 as an additional ETC in these rural study areas is in the public interest. It will facilitate
13 competition in the provisioning of universal services to the benefit of Kansas' rural
14 consumers. It will advance and preserve universal service by bringing new
15 telecommunications services to Kansas' rural consumers. It will also promote the
16 deployment of new technologies in the rural areas of the state, namely the wireless local
17 loop.. These factors support the Commission's determination that it is in the public
18 interest to designate Western as an additional ETC in the rural telephone company study
19 areas.

20 Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

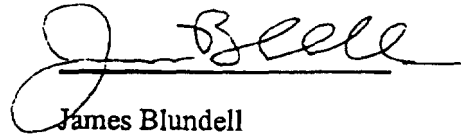
21 A. Yes.

VERIFICATION

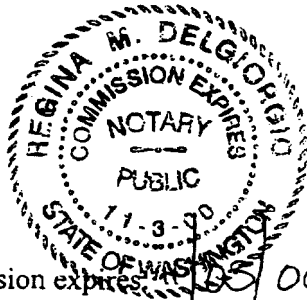
State of Washington)

County of King)

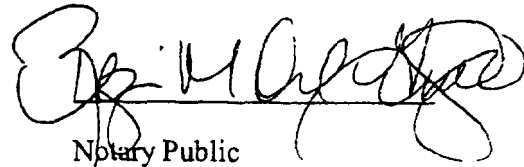
Comes now James Blundell, being of lawful age and duly sworn, who states that he is the witness who has provided the foregoing testimony, that he has prepared and read the foregoing testimony, and that the information contained therein is true and correct to the best of his knowledge and belief.


James Blundell

Subscribed and sworn to before me this 2 day of March, 2000.



My Commission expires 11-3-00


Notary Public

ATTACHMENT F

**THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of GCC License Corporation's)	
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Telecommunications Carrier.)	
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Telecommunications Carrier for Purposes of)	Docket No. 99-SSLC-173-ETC
Receiving Federal and State Universal Service)	
Support.)	

GCC LICENSE CORPORATION'S ("WESTERN WIRELESS")
RESPONSE TO STATE INDEPENDENT ALLIANCE'S
DATA REQUESTS TO WWW CO., INC. D/B/A CELLULAR ONE

COMES NOW GCC License Corporation ("Western Wireless" or "WW"), and hereby
responds to State Independent Alliance's data requests as follows:

SIA-001 Re: E911

ANI and ALI must be furnished to emergency service providers if those providers make
arrangements with a local service provider. If requested to do so, does WW have the
ability to provide such information?

RESPONSE:

Yes. Western Wireless is required to comply with all FCC regulations and orders regarding the
implementation of Phase I E911 service. Those orders require wireless carriers to provide
automatic number information ("ANI") and automatic location information ("ALI") upon request
from a public service answering point ("PSAP") for such information. Assuming the PSAP is
capable of receiving such information, the wireless carrier is required to implement the capability
of providing such information to the PSAP within 6 months of receipt of the request. Western
Wireless has selected a third-party implementation and database administrator, SCC
Communications, to assist the company in this important process. Western Wireless has
received requests from PSAPs in other states, including Texas and Colorado, and has
implemented Phase I E911 service in parts of Texas.

SLA-002 Re: E911

In regard to ANI and ALI information, does WW provide this information to any emergency service provider within the State of Kansas? Please list the places it has been requested and provided.

RESPONSE:

To date, Western Wireless has received no requests for Phase I E911 service from PSAPs in Kansas, presumably because no PSAP in Western's service area is capable of receiving the ALI and ANI data. Therefore, Western Wireless is not providing Phase I E911 service anywhere in Kansas. When Kansas PSAPs are capable of receiving the data, Western Wireless is capable and stands ready, willing and able to implement Phase I E911 service pursuant to FCC regulations and orders.

SIA-003 Re: E911

If the answer to SIA-002 is yes, please provide an outline of the procedure for submitting this information and keeping it updated. If the answer is no, please provide any plan WW has developed in case this information is requested.

RESPONSE:

The answer to SIA-002 was no. Western Wireless has developed, with the assistance of vendor SCC Communications, a critical path timeline to be used for Phase I E911 implementation. A sample timeline is attached to this response. This sample timeline assumes that the target date for completion of implementation is December 31, 2000.

Wireless Carrier:	Western Wireless
PSAP County:	
PSAP Name:	
MSC Location:	
LEC:	
Wireless Technology:	
Deployment State:	

Critical Path Activities:	Assigned	Scheduled	Scheduled	Completed
SCC Data Inventory Request sent to PSAP and returned.	SCC	4-Jul-00		
PSAP Boundary Maps sent and verified.	SCC	4-Jul-00	1 month	
MSC/Cell Site information delivered.	Western Wireless	Ongoing		
			Within 1 month of receipt of PSAP informatin	
Network Recommendation requested and completed.	SCC			
LEC Network Interconnect Agreement Signed.	Western Wireless	16-Nov-00	Before trunks	
Trunks ordered and installed between MSC and S/R.	Western Wireless	16-Nov-00	1 month	
			1 month after Network Recommendation provided	
Wireless Carrier Field Routing Recommendations completed.	SCC	Ongoing		
PSAP call routing meeting conducted.	SCC		2 weeks	
PSAP call routing plan completed.	SCC		2 weeks	
PSAP contract signed.	WWC / PSAP	Ongoing	Before trunks	
ESRD assignments made.	WWC / SCC	10-Dec-00	2 weeks	
LEC databases (S/R, ALI, WID) provisioned.	SCC	17-Dec-00	2 weeks	
SCP provisioned (if applicable).	SCC	17-Dec-00	N/A	
MSC switch translations provisioned.	Western Wireless	24-Dec-00	2 weeks	
GSM09 switch patch installed.	Western Wireless		N/A	
8-1-1 Testing initiated and concluded.	WWC / SCC	31-Dec-00	1 - 3 days	
9-1-1 Testing initiated and concluded.	WWC / SCC	31-Dec-00	1 - 3 days	

Status Report:	
Date	Status

Current Issues:	
Date	Issue

SIA-004 Re: E911

Has WW contacted public emergency service providers in Kansas, communicated with them, and discussed arrangements for the delivery of ANI or ALI from WW?

RESPONSE:

Because the Phase I E911 implementation process depends first on the capability of the PSAP to receive and utilize wireless ALI and ANI, the process cannot begin until the PSAP has requested service. Western Wireless has not contacted PSAPs in Kansas because the obligation to begin the implementation process rests with them, not Western Wireless. Western Wireless stands ready, willing and able to implement Phase I E911 as soon as the PSAPs are capable and request the service.

SIA 005 Re: Equal Access

K.S.A. 66-1,187(p) provides the Kansas definition of universal service to include equal access to long distance services. Does WW currently provide equal access as defined in K.S.A. 66-1,187(p) in Kansas?

RESPONSE:

No. Federal rules require a universal service provider to offer consumers access to interexchange service to make and receive interexchange calls. 47 C.F.R. § 54.101(s)(7). Equal access is not required. "The FCC does not include equal access to interexchange service among the services supported by universal service mechanisms." Universal Service Order, ¶ 78. Although the Kansas statute requires "equal access", the KCC has determined that "Section 332(c)(8) of the Federal Act, in fact, prohibits requiring CMRS providers to provide equal access to toll services as a condition to becoming ETCs." (Order No. 6, p. 11.) Western Wireless presently meets the requirement to provide interexchange access by providing all of its customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with several interexchange carriers (IXCs). Additionally, customers are able to reach their IXC of choice by dialing the appropriate access code.

SIA-006 Re: Equal Access

If WW intends to provide equal access to long distance carriers, as per the definition cited in K.S.A. 66-1, now or at some point in the future, please explain in detail how WW will interconnect with IXC's and/or underlying facilities based carriers for provision of interexchange long distance services selected by potential WW end user subscribers in the service areas identified in Exhibit A of WW's BUS Offering.

RESPONSE:

Western Wireless has no intention of providing equal access to interexchange services.

SIA-007 Re: Equal Access

Is it WW's position that it is impossible for WW to provide equal access as defined in K.S.A. 66-1,187(p)? What prevents WW from providing equal access?

RESPONSE:

No, it is not technically impossible for Western Wireless to provide equal access to interexchange services. It would, however, require substantial changes to the way in which Western Wireless engineers its network and runs its business. For example, Western Wireless would need to establish facilities that would allow for a customer to choose an IXC, requiring direct interconnection with multiple IXCs or the purchase of additional trunks from multiple ILECs. Presently, the lack of customer demand prevents Western Wireless from adding these additional layers of administrative and technical infrastructure required to offer equal access. Western Wireless provides customers with interexchange service that has value because of larger local calling areas and, therefore, minimal toll calling. This service offering, coupled with the availability of dial-around and other forms of access to the IXC of the customer's choice, removes customer demand for equal access.